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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

August 9, 2007

John G. Locke, President  
Angeles Chemical Co., Inc.  
20449 E. Rancho Los Cerritos Road  
Covina, CA 91724

RE: General Notice Letter  
Omega Chemical Corporation Superfund Site

Dear Mr. Locke:

The purpose of this letter is to provide you notice of Angeles Chemical Co., Inc.'s potential liability under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, at the Omega Chemical Corporation Superfund Site (the "Site"), in Whittier, California. The Site includes the location of a former refrigerant/solvent recycling operation ("Omega Chemical") in Whittier, California, but the term "Site" (as used here) refers to both the former Omega Chemical property and the areal extent (i.e., plume) of contaminated groundwater emanating from the Omega Chemical property.

The United States Environmental Protection Agency ("EPA") is spending public funds to investigate and control releases or potential releases of hazardous substances, pollutants or contaminants at the Site. Under Sections 106(a) and 107(a) of CERCLA, commonly known as Superfund, Potentially Responsible Parties ("PRPs") may be required to perform cleanup actions to protect the public health, welfare, or the environment. PRPs may also be responsible for all costs incurred by EPA in responding to any release or threatened release at the Site. PRPs include current and former owners and operators of facilities at which hazardous substances were disposed of, persons who arranged for the disposal of hazardous substances at a facility ("generators"), and persons who accepted hazardous substances for transport to a facility ("transporters").

EPA has evaluated information obtained through its investigation of the Site, and has determined that your company is a PRP as a former owner and operator of the property located at 8915 Sorensen Avenue, Santa Fe Springs, California and the property identified as Assessor's Parcel Number 8168-012-010. Both of these parcels are located within the Site.

**Omega Site Background**

During a Site Assessment in 1995, EPA observed in excess of 3,000 drums at the Site in various stages of deterioration. Data gathered in 1988 and 1995 also indicated the presence of hazardous substances including but not limited to methylene chloride, tetrachloroethylene, trichloroethylene, and Freon 11 and 113, in the subsurface soils and groundwater at the Site. On

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May 3, 1995, EPA issued an Action Memorandum authorizing actions necessary to abate imminent and substantial endangerment at the Site, including securing the Omega Chemical property, conducting sampling, removing grossly contaminated equipment, structures, and debris, removing containerized wastes and disposing, stabilizing or treating grossly contaminated soils.

On May 9, 1995 and August 31, 1995, EPA issued Unilateral Administrative Orders ("UAOs") to approximately 170 major generator PRPs, all of whom sent greater than 10 tons of hazardous materials to the Site, to perform removal activities at the Site. These major contributing parties thereafter formed a workgroup called the Omega Chemical Site PRP Organized Group, or "OPOG", and completed removal activities as required. In September 1998, EPA proposed the Site for listing on the National Priorities List ("NPL"). The Site was placed on the NPL on January 19, 1999.

Currently, the 109 members of OPOG (the "Settling Defendants") are performing work under a Partial Consent Decree which was entered by the District Court on February 28, 2001. Under this agreement, the Settling Defendants agreed to pay a portion of past costs and perform the following work at the Site:

- 1) implementation of a Remedial Investigation / Feasibility Study ("RI/FS") for contamination in the vadose zone within the "Phase 1A area" (as described in the Partial Consent Decree) of the Site;
- 2) performance of an Engineering Evaluation and Cost Analysis ("EE/CA") addressing groundwater contamination in the Phase 1A area;
- 3) implementation of the response action selected in EPA's Action Memorandum at the conclusion of the EE/CA;
- 4) performance of a risk assessment addressing contamination within the Phase 1A area; and
- 5) installation of up to three groundwater monitoring wells at locations downgradient of the Phase 1A area and upgradient of the City of Santa Fe Springs water supply well 30R3.

In addition, EPA has been conducting an EPA Fund-lead groundwater RI downgradient of the Phase 1A area. A Fund-lead FS for a Site-wide groundwater remedy will follow the Fund-lead groundwater RI, and it will take into account the PRP-lead groundwater response action in the Phase 1A area. At the conclusion of the FS, a Site-wide groundwater remedy will be proposed and, after public comment, selected by EPA.

In August 2002, EPA issued General Notice Letters to approximately 100 additional major generator PRPs, all of whom sent 10 tons or greater of hazardous materials to the Site. EPA has encouraged these PRPs to initiate dialogue with OPOG concerning joining the

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established workgroup. EPA will amend the existing Partial Consent Decree to include any parties which join the established group.

Prior to signing the Partial Consent Decree, several OPOG members withdrew from the group and elected not to sign the settlement. They formed a new group that later became known as the Omega Small Volume Organized Group or "OSVOG." On January 5, 2004, EPA issued a UAO to fifteen OSVOG members and three other recalcitrant parties. An Amended UAO was issued on July 2, 2004. The work required under the Amended UAO included the installation of groundwater wells and sampling downgradient from the former Omega Chemical property.

On October 28, 2003, EPA noticed approximately 300 *de minimis* parties at the Omega Site, each of which contributed 3 to 9.9 tons of hazardous materials to the Site. Approximately 170 *de minimis* parties accepted EPA's settlement offer. The Administrative Order on Consent to resolve these parties' potential liability at the Site was finalized on December 12, 2005.

### **General Notice**

Your facility is located above the contaminated groundwater plume that originates at and which extends three miles downgradient of the Omega Chemical property. The Agency believes that your facility is a source of hazardous substances which have come to be located in this plume. As such, you are a PRP at the Site. PRPs include individuals, businesses, governmental agencies, and other types of organizations. You may be a PRP if you are:

- 1) a current owner or operator of the Omega Site;
- 2) the former owner or operator of the Omega Site during the period of waste disposal;
- 3) a party that arranged for the treatment, disposal, or transportation of hazardous substances to the Omega Site (a "generator"); or
- 4) a party that selected the Omega Site as a place to dispose of hazardous substances and who transported these substances to the Omega Site (referred to as "transporters").

EPA is not extending a settlement offer or issuing an order for the performance of work to you at this time. The Agency anticipates issuing a Record of Decision to select a groundwater cleanup remedy within the next two to three years. At that point, EPA will initiate settlement discussions with you and all other PRPs at the Site for the performance of the Remedial Design/Remedial Action ("RD/RA") for the groundwater remedy.

EPA encourages good faith negotiations between the PRPs and EPA, as well as among the PRPs. You may contact EPA to obtain the most current list of PRPs that have previously been sent General Notice letters for this Site. In addition, OPOG's contact names and numbers are:

Keith F. Millhouse, Esq.  
(805) 230-2280

Mr. John Locke, President, Angeles Chemical Co., Inc.

Larry G. Gutteridge, Esq.  
(213) 628-7131

Enclosed are three Fact Sheets about the Site. In addition, copies of site-related documents are located at EPA's Regional Office in San Francisco and at the information repository listed below:

Superfund Records Center  
95 Hawthorne Street (4<sup>th</sup> Floor)  
San Francisco, CA 94105  
Ph: (415) 536-2000

Whittier Public Library  
7344 S. Washington Avenue  
Whittier, CA 90602  
Ph: (562) 464-3450

Further information about the Site may be located on the following EPA web page:

<http://www.epa.gov/region09/omegachemical>

Also enclosed is an information sheet intended to inform small businesses of their rights under the Small Business Regulatory Enforcement Fairness Act (SBREFA) to comment to an Ombudsman about EPA enforcement activity. This information sheet also provides information on compliance assistance available to small businesses. We have included this information sheet without making a determination as to whether your business is a small business as defined by Section 222 of SBREFA or related provisions.

Please use the enclosed Primary Contact Designation Form to designate the most appropriate individual to receive all further correspondence on this matter on your behalf. We request that you mail us the completed form within thirty (30) days of your receipt of this letter.

We will continue to send future correspondence to you until we receive this form. The completed Primary Contact Designation Form should be mailed to:

Linda Ketellapper, SFD-7-5  
U.S. Environmental Protection Agency  
Superfund Division  
75 Hawthorne Street  
San Francisco, CA 94105

This notice letter does not affect or nullify any other legal obligations you may have regarding your facility. EPA understands that Angeles Chemical Co., Inc. is subject to one or more orders issued by the California Department of Toxic Substances Control and that Angeles Chemical Co., Inc. is conducting response activities pursuant to such order(s). If you are engaged in clean-up or other activities under the direction of federal, state or local authorities,

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you should continue such activities as appropriate. Likewise, this notice letter has no effect on any obligations which you may have in a court of law.

Although this letter does not affect these other obligations, EPA hereby requests, by its authority under CERCLA Section 104(e), that you provide a written response reporting the status of all of those activities and obligations. The response should include a copy of all agreements and/or orders between you and other parties related to your facility and on-going activities and obligations. Your response should be made in writing and submitted to EPA within thirty (30) days of receipt of this letter. **It should be directed to Linda Ketellapper, the EPA Case Developer, at the address provided above.**

If you have general questions regarding the Site, please contact Linda Ketellapper at (415) 972-3104. If you have any technical questions regarding the Site, please contact Chris Lichens, the Remedial Project Manager, at (415) 972-3149. If you have any legal questions, you may contact Steve Berninger, Assistant Regional Counsel, at (415) 972-3909.

Sincerely,



Elizabeth J. Adams  
Chief, Site Cleanup Branch

cc: Jeffery Caufield, Esq., Caufield & James LLP  
Karl Fingerhood, DOJ EES  
Steve Berninger, EPA ORC  
Linda Ketellapper, EPA  
Christopher Lichens, EPA  
Fred Schauffler, EPA  
Sara Amir, DTSC  
Larry Gutteridge, OPOG  
Keith Millhouse, OPOG

Enclosures:

- U.S. EPA Fact Sheet: "Omega Chemical Superfund Site Update", September 2003
- U.S. EPA Fact Sheet: "Proposed Plan for Interim Groundwater Action", August 2005
- U.S. EPA Fact Sheet: "EPA Evaluates Indoor Air at Omega Chemical Site", November 2004
- Information Sheet, U.S. EPA Small Business Resources
- Primary Contact Designation Form. Please complete and return this form **within 30 days** of your receipt of this letter.

## PRIMARY CONTACT DESIGNATION FORM

### Angeles Chemical Co., Inc.

#### PLEASE COMPLETE AND RETURN THIS FORM WITHIN THIRTY CALENDAR DAYS OF RECEIPT

Please complete this form by printing or typing the requested information. If any of the information provided on this form changes after submission of the form including, but not limited to, changes in corporate relationships, please notify EPA at the address listed below as soon as possible. Thank you for your cooperation.

**1. Please provide the following information** for the single person who will be the above-named company's or individual's contact for all future communications (including correspondence, informational mailings, etc.) from EPA regarding Omega. You may designate a legal or other representative as the single primary contact. Please enter "N/A" if the requested information is not applicable to you.

Company/Organization/Individual Name: (only if different from above):	
Name of Designated Contact :	Contact's Title:
Contact's Firm Name:	
Street Address (no P.O. Box):	
City, State & Zip:	
Telephone Number:	Fax Number:
E-mail Address:	
Web-site Address:	
<b>2. Other information:</b> Law/Consulting Firm Name (if applicable):	

#### 3. Printed Name and Signature of Person Completing This Form

Printed Name	Title	Company/Organization
Signature		Date

#### 4. Please return this form to:

Linda Ketellapper, Case Developer  
Mail Code SFD-7-5  
U.S. Environmental Protection Agency  
75 Hawthorne St.  
San Francisco, CA 94105



FedEx Express  
Customer Support Trace  
3875 Airways Boulevard  
Module H, 4th Floor  
Memphis, TN 38116

U.S. Mail: PO Box 727  
Memphis, TN 38194-4643  
Telephone: 901-369-3600

August 10, 2007

Dear Customer:

The following is the proof of delivery you requested with the tracking number **924619067680**.

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**Delivery Information:**

<b>Status:</b>	Delivered	<b>Delivery location:</b>	COVINA, CA
<b>Signed for by:</b>	Signature release on file	<b>Delivery date:</b>	Aug 10, 2007 10:49
<b>Service type:</b>	Standard Envelope		

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<b>Tracking number:</b>	924619067680	<b>Ship date:</b>	Aug 9, 2007
		<b>Weight:</b>	0.5 lbs.

**Recipient:**  
COVINA, CA US

**Shipper:**  
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Telephone: 901-369-3600

August 10, 2007

Dear Customer:

The following is the proof of delivery you requested with the tracking number **924619067772**.

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**Delivery Information:**

<b>Status:</b>	Delivered	<b>Delivery location:</b>	SAN DIEGO, CA
<b>Signed for by:</b>	S.SANTOS	<b>Delivery date:</b>	Aug 10, 2007 14:25
<b>Service type:</b>	Standard Envelope		

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<b>Tracking number:</b>	924619067772	<b>Ship date:</b>	Aug 9, 2007
		<b>Weight:</b>	0.5 lbs.

**Recipient:**  
SAN DIEGO, CA US

**Shipper:**  
OAKLAND, CA US

**Reference**

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